

**FILED**

**JUL 28 2021**

**U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROTIMI OLADIMEJI AND  
OLUMIDE AKINRINMADE,

Defendant.

**4:21CR00423 RWS/SRW**

No.

**INDICTMENT**

**COUNT 1**

(Conspiracy to Commit Mail Fraud and Wire Fraud)

The Grand Jury charges:

**A. Background Concerning Romance Scams**

1. Fraud schemes in which a perpetrator pretends to possess romantic intentions towards a victim in order to gain their affection and entice them to send money and merchandise on the perpetrator's behalf, are known as "*Romance Scams*."

2. Victims are lured into the scams when the perpetrators use aliases and stolen photographs to create online dating profiles and social media accounts.

3. After grooming their victims, scammers create financial hardship scenarios necessitating requests for financial assistance.

4. Romance scammers enlist others to avoid detection by law enforcement and concerned family members of their victims. One role that others play is that of a "*mule*." A "*mule*" is a person who receives the fraudulently obtained money and merchandise on behalf of the scammer, and

forwards the proceeds to the scammer. A mule can be a witting participant or a victim used to funnel proceeds to another mule.

**B. The Scheme to Defraud**

5. On or about May 4, 2019, Defendant **ROTIMI OLADIMEJI**, Defendant **OLUMIDE AKINRINMADE**, and persons unknown to the Grand Jury established a profile on LinkedIn, an internet networking site for professionals, in the name of G.J., but utilizing the photograph of K.H., a German national. According to the profile, G.J. was a Belgian national who was a veterinarian and animal behaviorist living in the Greater St. Louis area.

6. On or about August 20, 2019, R.W., a resident of the Eastern District of Missouri, created a dating profile on Elite Singles, an internet dating service.

7. On or about October 7, 2019, Defendant **ROTIMI OLADIMEJI** began using the identity of G.J. to communicate through emails, texts, and telephone calls with R.W. Through the assumed identity, Defendant **ROTIMI OLADIMEJI** directed R.W. to the LinkedIn profile of G.J. in an effort to buttress statements made about G.J.

8. On or about October 20, 2019, Defendant **ROTIMI OLADIMEJI** using the identity of G.J. sent R.W. an itinerary showing his plans for a business trip to the City of Dubai within the United Arab Emirates between October 22, 2019 and November 7, 2019.

9. Approximately one day after G.J.'s alleged arrival in Dubai, someone purporting to be G.J. requested R.W.'s help with an urgent business issue. Defendant **ROTIMI OLADIMEJI** used the identity of G.J. to electronically provide wire transmission information to R.W. so R.W. could wire funds from her financial institution in the United States of America to a financial institution in the United Arab Emirates.

10. After the initial transfer of funds and through April 26, 2020, Defendant **ROTIMI OLADIMEJI** and persons unknown to the Grand Jury informed R.W. that G.J. had experienced purported financial emergencies requiring R.W. to conduct foreign monetary wire transmissions to assorted financial institutions based in the United Arab Emirates. Defendant **ROTIMI OLADIMEJI** and persons unknown to the Grand Jury declared that G.J. would be unable to leave Dubai and return to R.W. unless the funds were transmitted.

11. Between on or about November 1, 2019 and on or about April 10, 2020, for the asserted benefit of G.J., Defendant **ROTIMI OLADIMEJI** and persons unknown to the Grand Jury persuaded R.W. to send through a private, interstate carrier cashier's checks and cash to H.E. using the Richardson, Texas residential address of Defendant **OLUMIDE AKINRINMADE**. The cashier's checks and cash were subsequently deposited into financial accounts opened by Defendant **ROTIMI OLADIMEJI**, Defendant **OLUMIDE AKINRINMADE**, and persons known and unknown to the Grand Jury for their personal benefit.

12. Believing the claims of Defendant **ROTIMI OLADIMEJI**, Defendant **OLUMIDE AKINRINMADE**, and persons known and unknown to the Grand Jury, between on or about October 23, 2019 and on or about April 26, 2020, R.W. conducted foreign monetary wire transmissions to the United Arab Emirates and sent through a private, interstate carrier cashier's checks and cash to Defendant **OLUMIDE AKINRINMADE**'s residence in Richardson, Texas in an amount that exceeded \$1,200,000.

**C. Conspiracy**

13. Beginning on or about May 4, 2019, and continuing to on or about April 27, 2020, in the Eastern District of Missouri and elsewhere, the defendants,

**ROTIMI OLADIMEJI and OLUMIDE AKINRINMADE,**

and persons, known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other and persons, known and unknown to the Grand Jury, to commit the following offenses against the United States:

- a. to use the mails, and private and commercial interstate carriers, in executing, and attempting to execute, a scheme and artifice to defraud in violation of Title 18, United States Code, Section 1341;
- b. to use a false, fictitious, and assumed name to engage in a mail fraud scheme in violation of Title 18, United States Code, Section 1342; and,
- c. to transmit and cause to be transmitted by means of wire communications in foreign commerce, any sounds and signals for the purpose of knowingly executing and attempting to execute, a scheme and artifice in violation of Title 18, United States Code, Section 1343.

**D. Ways, Manner, and Means of the Conspiracy**

14. It was a part of the conspiracy that the defendants and persons, unknown to the Grand Jury, would by deceit, craft, trickery, and dishonest means, defraud profit from third parties by inducing them to believe that they were in a romantic relationship.

15. The primary purpose of the conspiracy was for the defendant and persons, unknown to the Grand Jury, to profit from fraudulent representations that R.W. was in a romantic relationship with G.J. and that G.J. needed R.W.'s financial assistance.

16. It was further part of the conspiracy that Defendant **ROTIMI OLADIMEJI** and persons unknown to the Grand Jury electronically transmitted instructions to R.W. requesting that R.W. electronically transmit funds from financial institutions in the Eastern District of Missouri to financial institutions within the United Arab Emirates and that R.W. send through a private, interstate carrier cashier's checks and cash from the Eastern District of Missouri to H.E. at 540 Buckingham Road, Richardson, Texas.

17. It was further part of the conspiracy that Defendant **ROTIMI OLADIMEJI**, Defendant **OLUMIDE AKINRINMADE**, and persons unknown to the Grand Jury accepted delivery of the mailed packages containing cash and cashier's checks at 540 Buckingham Road, Richardson, Texas in the name of H.E.

18. It was further part of the conspiracy that Defendant **ROTIMI OLADIMEJI**, Defendant **OLUMIDE AKINRINMADE**, and persons known and unknown to the Grand Jury deposited the fraudulently obtained cashier's checks and cash in various financial accounts in the United States, and subsequently transferred portions of the illegal proceeds to Defendant **ROTIMI OLADIMEJI**, Defendant **OLUMIDE AKINRINMADE**, and persons known and unknown to the Grand Jury, so the funds could be used for their personal benefit.

All in violation of Title 18, United States Code, Section 1349.

**COUNTS 2 THROUGH 5**

(Mail Fraud)

The Grand Jury realleges the facts set forth in paragraphs 1 through 18 and further charges:

**B. The Scheme to Defraud**

19. Beginning on or about October 7, 2019 and continuing through on or about April 10, 2020, in the Eastern District of Missouri and elsewhere, the defendants,

**ROTIMI OLADIMEJI and OLUMIDE AKINRINMADE,**

being aided, abetted, counseled, and induced by persons known and unknown to the Grand Jury, devised, and intended to devise, a scheme and artifice to defraud R.W. into sending through a private, interstate carrier cash and cashier's checks to H.E., 540 Buckingham Road, Richardson, Texas under the mistaken belief that the cash and cashier's checks were for the benefit of G.J.

20. It was part of the scheme and artifice to defraud that:

- a. Through electronic mail, Instant Messages, text messages, and telephone calls, Defendant **ROTIMI OLADIMEJI** and persons unknown to the Grand Jury convinced R.W. that R.W. was involved in a romantic relationship with a Belgian born individual named G.J.
- b. Defendant **ROTIMI OLADIMEJI** and persons unknown to the Grand Jury falsely claimed that G.J. could not leave the United Arab Emirates until he paid various fees, taxes, and penalties to the United Arab Emirates government.
- c. Defendant **ROTIMI OLADIMEJI** and persons unknown to the Grand Jury directed R.W. to send cashier's checks and cash through a private, interstate carrier from the

Eastern District of Missouri to H.E. 540 Buckingham Road, Richardson, that being, Defendant **OLUMIDE AKINRINMADE**'s residence.

- d. Defendant **ROTIMI OLADIMEJI** and persons unknown to the Grand Jury instructed R.W. to make the cashier's checks payable to T.G., F.J., and Blue Springs Corporation.
- e. Defendant **OLUMIDE AKINRINMADE**, Defendant **ROTIMI OLADIMEJI**, and persons unknown to the Grand Jury deposited the cashier's check made payable to F.J. into an account held at a federally insured financial institution opened in the name of F.J. using a counterfeit Nigerian passport in the name of F.J., but bearing Defendant **OLUMIDE AKINRINMADE**'s photograph.
- f. Defendant **ROTIMI OLADIMEJI** deposited into his financial account at Bank of America proceeds of a \$54,000 cashier's check that R.W. made payable to T.G. and sent to H.E. through a private, interstate carrier.
- g. Defendant **ROTIMI OLADIMEJI** and persons unknown to the Grand Jury persuaded R.W. to transfer money through foreign wire transmissions from her financial institutions that were located in the Eastern District of Missouri to assorted financial institutions located in the United Arab Emirates.

**C. The Mailing**

21. On or about the dates listed below, in the Eastern District of Missouri, the defendants, **ROTIMI OLADIMEJI and OLUMIDE AKINRINMADE**, being aided, abetted, counseled, and induced by one another and persons known and unknown to the Grand Jury for the purpose of executing the above-described scheme to defraud, did knowingly cause to be delivered packages containing the items described below by a private,

interstate carrier from R.W. in the Eastern District of Missouri to H.E. at 540 Buckingham Road, Richardson, Texas:

COUNT	DATE	TRACKING NUMBER	CONTENTS
2	November 1, 2019	780676205601	\$54,000 Bank of America Cashier's Check made payable to T.G.
3	November 8, 2019	780845200319	(a) \$30,000 Commerce Bank Cashier's Check made payable to F.J. (b) \$80,000 Bank of America Cashier's Check made payable to Blue Springs Corporation (c) \$60,000 Commerce Bank Cashier's Check made payable to T.G. (d) \$5,000 Cash
4	January 2, 2020	779389735547	\$16,500 Commerce Bank Cashier's Check
5	February 7, 2020	390230222196	\$7,000 Cash

All in violation of Title 18, United States Code, Sections 1341 and 2.

### **COUNTS 6 THROUGH 9**

(Wire Fraud)

The allegations contained in paragraphs 1 through 18 and 20 of this Indictment are re-alleged and incorporated by reference as if fully set out herein.

#### **C. WIRE TRANSMISSION**

22. On or about the dates listed below, in the Eastern District of Missouri and elsewhere, the defendant,



**ROTIMI OLADIMEJI,**

being aided, abetted, counseled and induced by persons unknown to the Grand Jury, devised, and intended to devise, a scheme and artifice to defraud for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted, by means of wire communication in and affecting foreign commerce, certain writings, signs, signals, pictures, and sounds, to include the electronic transmission of the listed funds from the bank accounts of R.W. to the named recipients at the financial institution listed below:

COUNT	DATE	SENDING BANK	RECIPIENT	RECEIVING BANK	TRANSACTION AMOUNT
6	October 23, 2019	Bank of America	G.S.B.	National Bank of Fujairah Iban	\$15,000
7	December 12, 2019	Commerce Bank	M.S.D.	Emirates NBD Bank PJSC	\$30,000
8	December 19, 2019	Bank of America	M.S.D.	Emirates NBD PJSC	\$66,450
9	December 30, 2019	Bank of America	C.D.	Noor Bank PJSC	\$150,000

All in violation of Title 18, United States Code, Sections 1343 and 2.

**COUNT 10**

(Aggravated Identity Theft)

The Grand Jury realleges the facts set forth in paragraphs 1 through 18 and 20 and further charges:

23. On or about May 4, 2019, in the Eastern District of Missouri, the defendant,

**ROTIMI OLADIMEJI**

being aided, abetted, counseled, and induced by persons unknown to the Grand Jury did knowingly possess and use, without lawful authority, the name of G.J., knowing that the name belonged to another actual person, during and in relation to the commission of the felony offenses of: mail

fraud, Title 18, United States Code, Section 1341; using an assumed name and address, Title 18, United States Code, Section 1342; wire fraud, Title 18, United States Code, Section 1343; and conspiracy to commit mail fraud, using an assumed name and address, and wire fraud.

In violation of Title 18, United States Code, Sections 1028A and 2.

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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TRACY LYNN BERRY - 014753 TN  
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